

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

BERNADETTE HIGHTOWER, LATERSHIA JONES, GEORGE DEAN, and BRUCE MARK WOODRUFF, individually and on behalf of all others similarly situated,

Plaintiffs,

V.

RECEIVABLES PERFORMANCE MANAGEMENT, LLC,

Defendant.

Case No. 2:22-cv-01683-RSM

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT TO ANSWER AMENDED
CONSOLIDATED CLASS ACTION
COMPLAINT AND TO SUBMIT INITIAL
DISCLOSURES AND JOINT STATUS
REPORT AND CASE MANAGEMENT
PLAN**

**NOTE ON MOTION CALENDAR:
November 27, 2023**

I. STIPULATION

Pursuant to Local Rules 7(j) and 10(g), Plaintiffs Bernadette Hightower, Latershia Jones, George Dean, and Bruce Mark Woodruff, individually and on behalf of all others similar situated (“Plaintiffs”) and Defendant Receivables Performance Management, LLC (“Defendant”) hereby respectfully submit this stipulated motion for an extension of time for Defendant to answer, move or otherwise respond to Plaintiffs’ Consolidated Amended Class Action Complaint and for

1 an extension of time to submit Initial Disclosures and Joint Status Report and Discovery Plan,
2 and in support thereof, state as follows:

3 1. Plaintiffs filed their Amended Consolidated Class Action Complaint on May 4,
4 2023. ECF No. 42.

5 2. Defendant's current due date for responding to Plaintiffs' Consolidated Class
6 Action Complaint is November 27, 2023. ECF No. 51.

7 3. Additionally, the Court has set the following deadlines for initial disclosures and
8 submission of the Joint Status Report and Discovery Plan: 1) Deadline for FRCP 26(f)
9 Conference: December 1, 2023; (2) Initial Disclosures Pursuant to FRCP 26(a)(1): December
10 8, 2023; and (3) Combined Joint Status Report and Discovery Plan as required by FRCP
11 26(f) and Local Civil Rule 26(f): December 15, 2023. ECF No. 51.

12 4. As set forth in the Parties' motion to amend complaint and for an extension of
13 time for Defendant to respond to the Amended Consolidated Class Action Complaint (ECF
14 No. 40), the Parties agreed to discuss the possibility of an early resolution, including the
15 exchange of information to allow the Parties to evaluate the strengths and weaknesses of
16 Plaintiffs' claims and Defendant's defenses, as well as the scheduling of a mediation before
17 Hon. Wayne Andersen (Ret.). This mediation was conducted on July 12, 2023. ECF No. 45.

18 5. The Parties continue to discuss early resolution of this matter with the assistance
19 of Hon. Wayne Anderson (Ret.). Following the last mediation session, the Parties exchanged
20 significant documentation to assist in the potential early resolution of this matter.
21 Additionally, the Parties have agreed to exchange further documentation following the initial
22 exchange to assist in the potential early resolution of this matter. Mediator Hon. Wayne
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1 Andersen (Ret.) continues to be involved and continues to facilitate the Parties' efforts to
2 resolve the matter.

3 6. In light of the above, the Parties stipulate and agree that good cause exists for an
4 extension as stipulated herein and that it would be beneficial to further extend the time for
5 Defendant to answer, move, or otherwise respond to Plaintiffs' Consolidated Amended
6 Complaint.

7 7. As such, in light of the above and subject to Court approval, the Parties stipulate
8 and agree that Defendant shall have an extension of time up to and including January 26,
9 2024 to answer, move, or otherwise respond to Plaintiffs' Consolidated Amended Class
10 Action Complaint.

12 8. Moreover, the Parties stipulate and agree, subject to Court approval, that the
13 deadlines for initial disclosures and submission of the Joint status Report and Discovery Plan
14 be extended as follows: (1) Deadline for FRCP 26(f) Conference: February 1, 2024; (2)
15 Initial Disclosures Pursuant to FRCP 26(a)(1): February 8, 2024; and (3) Combined Joint
16 Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):
17 February 15, 2024.

19 WHEREFORE, the Parties respectfully request that this stipulated motion be granted and that
20 Defendant be granted an extension as stipulated and agreed herein.

21 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 27th day of
22 November, 2023.
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ORDER

It is so ORDERED;

Defendant shall answer, move, or otherwise respond to Plaintiffs' Consolidated Amended Class Action Complaint on or before January 26, 2024.

The deadlines for initial disclosures and submission of the Joint Status Report and Discovery Plan per ECF No. 51 are extended as follows: (1) Deadline for FRCP 26(f) Conference: February 1, 2024; (2) Initial Disclosures Pursuant to FRCP 26(a)(1): February 8, 2024; and (3) Combined Joint Status Report and Discovery Plan as required by FRCP 26(f) and Local Civil Rule 26(f): February 15, 2024.

DATED this 30th day of November, 2023.


RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE